

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

Clerk, U.S. District Court
Southern District of Texas
FILED

AUG 04 2017

David J. Bradley, Clerk of Court

United States of America)

v.)

VERNON SONSTENG)

&)

MICHAEL VILLEGAS)

Case No. C-17-782M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 16, 2017 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 1028(a)(1)

18 USC 1028(a)(2)

18 USC 1028(a)(3)

18 USC 1708

18 USC 513(a)

Whoever knowingly and without lawful authority produces an identification document; Whoever knowingly transfers an identification document, knowing it was fraudulent

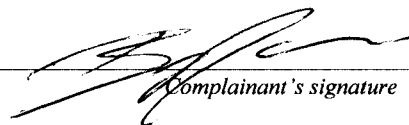
Whoever knowingly possesses with intent to use unlawfully or transfer five or more identification documents

Mail Theft

Knowingly and with intent to deceive another person or organization, did make, utter or possess a counterfeited security "check"

This criminal complaint is based on these facts:

See attached

☒ Continued on the attached sheet.


Brian J. Pebbles

Printed name and title

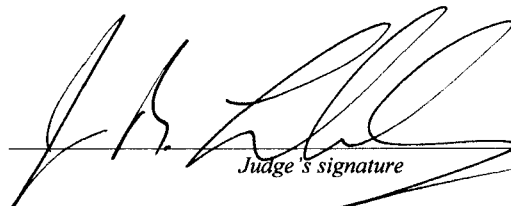
Sworn to before me and signed in my presence.

Date:

August 4, 2017

City and state:

Corpus Christi, TX



Jason Libby, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brian Pebbles, being duly sworn, hereby depose and say

I am Special Agent, assigned to the Corpus Christi Office, United States Secret Service, since June of 2017 and a Special Agent of the United States Secret Service since July 2003.

The information contained in this affidavit is based on my training, experience, and participation in identity theft investigations, my personal knowledge and observations during the course of this investigation, and information provided to me by other sources noted herein.

On or about July 16, 2017, VERNON SONSTENG and MICHAEL VILLEGAS were stopped by Portland Police Department after a traffic violation. It is noted that SONSTENG who failed to provide his true identity to officers was subsequently arrested for an active warrant from pardon and parole. It is further noted that VILLEGAS was released at the time and was subsequently arrested at the Days Inn in Portland, TX upon further investigation by the Portland, PD. Officers observed in the vehicle a large number of items of stolen mail and counterfeit checks, a key copying machine, laptop computer and a printer. Both SONSTENG and VILLEGAS had numerous blank checks in other people's names on their person. A cooperating individual (CI) informed Portland Police that upon his release during SONSTENG's arrest, VILLEGAS informed him/her that he stole mail from a restaurant on his way to the hotel. The CI also stated that SONSTENG and VILLEGAS would steal mail and use other people's information to make fake ID's and manufacture checks.

Continuing on about July 16, 2017, Portland Police impounded the vehicle belonging to SONSTENG pursuant to his arrest. The following items were located by the Portland Police Department during the search incident to the vehicle being impounded:

One (1) counterfeit temporary Texas Driver's License bearing the name C.H., #XXXX7666, with a photograph of MICHAEL VILLEGAS, was located in VILLEGAS wallet. Portland Police Department conducted a record check regarding Texas Driver License #XXXX7666; this query revealed that Texas Driver License #XXXX7666 is registered to an individual with the initials R.J. D.

One (1) genuine Illinois Driver License # XXXX-XXXX-1829 belonging to a person with the initials T.J.L. located in VILLEGAS' wallet.

One (1) counterfeit temporary Texas Driver's License bearing the name C.H., #XXXX7698, with a photograph of MICHAEL VILLEGAS, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX7698; this query revealed that Texas Driver License #XXXX7698 is registered to an individual with the initials J.A.G.

Two (2) counterfeit temporary Texas Driver's Licenses bearing the name C.H., #XXXX3088, with a photograph of MICHAEL VILLEGAS, was located in the vehicle being driven by SONSTENG. Portland police Department conducted a records check regarding Texas Driver License #XXXX3088 this query revealed that Texas Driver License #XXXX3088 is registered to an individual with the initials R.E.T.

One (1) counterfeit temporary Texas Driver's License bearing the name C.V., #XXXX7242, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX7242; this query revealed that Texas Driver License #XXXX7242 is registered to an individual with the initials C.T.V.

Two (2) counterfeit temporary Texas Driver's Licenses bearing the name C.V., #XXXX7078, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX7078; this query revealed that Texas Driver License #XXXX7078 is registered to an individual with the initials H.A.L.

One (1) counterfeit temporary Texas Driver's License bearing the name C.V., #XXXX0411, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX0411; this query revealed that Texas Driver License #XXXX0411 is registered to an individual with the initials J.G.G.

One (1) counterfeit temporary Texas Driver's License bearing the name C.V., #XXXX5167, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX0411; this query revealed that Texas Driver License #XXXX5167 is registered to an individual with the initials A.C.V. Jr.

One (1) counterfeit temporary Texas Driver's License bearing the name C.V., #XXXX2809, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX2809; this query revealed that Texas Driver License #XXXX2809 is registered to an individual with the initials A.C.

One (1) counterfeit temporary Texas Driver's License bearing the name C.V., #XXXX4729, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX4729; this query revealed that Texas Driver License #XXXX4729 is registered to an individual with the initials L.F.R.

One (1) counterfeit temporary Texas Driver's License bearing the name C.V., #XXXX0432, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check

regarding Texas Driver License #XXXX0432; this query revealed that Texas Driver License #XXXX0432 is registered to an individual with the initials N.T.

One (1) counterfeit temporary Texas Driver's License bearing the name C.V., #XXXX7194, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX7194; this query revealed that Texas Driver License #XXXX7194 is registered to an individual with the initials C.E.M.

One (1) counterfeit temporary Texas Driver's License bearing the name J.V., #XXXX1905, with a photograph of VERNON SONSTENG, was located in the vehicle being driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX1905; this query revealed that Texas Driver License #XXXX1905 is registered to an individual with the initials C.B.H.

One (1) counterfeit temporary Texas Driver's License bearing the name R.B., #XXXX5369, with a photograph of VERNON SONSTENG, was located in the vehicle driven by SONSTENG. Portland Police Department conducted a record check regarding Texas Driver License #XXXX5369; this query revealed that Texas Driver License #XXXX5369 is registered to an individual with the initials R.A.D.

One (1) counterfeit Whitney Bank check belonging to a victim with the initials C.V., TXDL #XXXX7242, Acct # XXXXX9115, check # 77875, made payable to Ace Hardware, in the amount of \$379.25 (cashed on 5/12/17). It is noted that TXDL #XXXX3495 is registered to a person with the initials C.T.V.

Two (2) stolen Wells Fargo Bank checks belonging to a victim with the initials M.K., Acct #XXXXXX2074, check #4727, made payable to Walmart, in the amount of \$116.90 and check # 4728, made payable to Discover, in the amount of \$51.68 were discovered in the possession of SONSTENG AND VILLEGAS at the time of their arrest.

On 7/16/17, McAllen Resident Agent in Charge Dan Morales spoke to a victim with the initials M.K. regarding the aforementioned Wells Fargo Bank checks. M.K. advised that he/she had placed his/her mail in his/her outgoing mailbox in front of his/her residence and assumed that the postman had collected them. M.K. additionally advised that two (2) additional counterfeit checks, #4741 made payable to H.E.B for \$110 and #4742 made payable to H.E.B. for \$93.26 were cashed against his/her account. On 7/27/17, victim M.K. provided a written statement that he/she does not know VERNON SONSTENG and MICHAEL VILLEGAS and did not authorize them to remove his/her mail from his/her mailbox.


On 7/16/17, McAllen Resident Agent in Charge Dan Morales met with a victim with the initials S.A. in Portland, TX. S.A. was shown copies of US Mail stolen from a restaurant that was found in the possession of SONSTENG and VILLEGAS at the time of their arrest. S.A. stated that he/she does not know VERNON SONSTENG and MICHAEL

VILLEGAS and did not authorize them to remove his/her mail from his/her business mailbox.

In addition to the above counterfeit Texas Driver License's and counterfeit checks the Portland Police Department also seized stolen mail, a Hewlett Packard Laptop Computer, Acer Laptop Computer, white HP Deskjet printer, black HP Envy all in one printer/scanner, twelve (12) cellular telephones, Samsung Tablet, two (2) USB drives, two (2) memory cards, micro SD adapter, Apple iPad, blank checks, check writing software and numerous types of narcotics. It is also noted that there are numerous other checks not listed which contain additional bank account numbers.

Based on the above information, this affiant believes that VERNON SONSTENG, on or about July 16, 2017, did, in the Southern District of Texas, knowingly possessed the above listed Counterfeit Temporary Texas Driver License's, and counterfeit checks, with the intent to use unlawfully in violation of 18 USC 1028(a)(1) – Whoever knowingly and without lawful authority produces an identification document, authentication feature, or false identification document, 18 USC 1028(a)(3) - Knowingly possesses with intent to use unlawfully or transfer five or more identification documents, authentication features, or false identification documents and 18 USC 1708 - whoever steals, takes, or abstracts, or by fraud or deception obtains, or attempts so to obtain, from or out of any mail, post office, or station thereof, letter box, mail receptacle, or any mail route or other authorized depository for mail matter, or from a letter or mail carrier, any letter, postal card, package, bag, or mail or abstracts or removes from any such letter, package, bag, or mail, any article or thing contained therein, or secretes, embezzles, or destroys any such letter, postal card, package, bag, or mail, or any article or thing contained therein and 513(a) – Knowingly and with intent to deceive another person or organization, did make, utter or possess a counterfeited security "check".

Based on the above information, this affiant believes that MICHAEL VILLEGAS, on or about July 16, 2017, did, in the Southern District of Texas, knowingly possessed the above listed Texas Driver License and Counterfeit Temporary Texas Driver License's and counterfeit checks, with the intent to use unlawfully in violation of 18 USC 1028(a)(1) - Whoever knowingly and without lawful authority produces an identification document, authentication feature, or false identification document, 1028(a)(2) – Knowingly transfers an identification document, authentication feature, or false identification document knowing that such document or feature was stolen or produced without lawful authority and 18 USC 1708 - whoever steals, takes, or abstracts, or by fraud or deception obtains, or attempts so to obtain, from or out of any mail, post office, or station thereof, letter box, mail receptacle, or any mail route or other authorized depository for mail matter, or from a letter or mail carrier, any letter, postal card, package, bag, or mail or abstracts or removes from any such letter, package, bag, or mail, any article or thing contained therein, or secretes, embezzles, or destroys any such letter, postal card, package, bag, or mail, or any article or thing contained therein and 18 USC 513(a) – Knowingly and with intent to deceive another person or organization, did make, utter or possess a counterfeited security "check".



Brian J. Pebbles
U.S. Secret Service

Subscribed to and sworn before me
on this 4 day on August 2017.



Jason Libby
United States Magistrate Judge